

SIGAL CHATTAH
United States Attorney
District of Nevada
Nevada Bar No. 8264
CLAY A. PLUMMER
Nevada Bar No. 6778
Special Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: (702) 388-6336
clay.plummer@usdoj.gov
Attorneys for the United States

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE MISAEL DIAZ-MARTINEZ,
aka "Jose Diaz,"
aka "Jose Martinez,"
aka "Jose Alberto Moran-Martinez,"

Defendant.

Case No. 2:25-mj-00373-DJA

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Sigal Chattah, United States Attorney, and Clay Plummer, Special Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Ellesse Henderson, Assistant Federal Public Defender, counsel for defendant JOSE MISAEL DIAZ-MARTINEZ, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1 1. The United States Attorney's Office has developed an early disposition
2 program for immigration cases, authorized by the Attorney General pursuant to the
3 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
4 extended to the defendant a plea offer in which the parties would agree to jointly request an
5 expedited sentencing immediately after the defendant enters a guilty plea.

6 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
7 history until after the defendant enters his guilty plea unless the Court enters an order
8 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
9 a defendant's initial appearance when charged by indictment.

10 3. The U.S. Probation Office informs the government that it would like to begin
11 obtaining the criminal history of defendants eligible for the early disposition program as
12 soon as possible after their initial appearance so that the Probation Office can complete the
13 Presentence Investigation Report by the time of the expected expedited sentencing.

14 4. Accordingly, the parties request that the Court enter an order directing the
15 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

16 DATED this_19th_ day of May, 2025.

17 Respectfully Submitted,

18 RENE L. VALLADARES
19 Federal Public Defender

 SIGAL CHATTAH
 United States Attorney

20 /s/ 

21 Assistant Federal Public Defender
22 Counsel for Defendant
23 JOSE MISAEL DIAZ-MARTINEZ

 /s/ *Clay Plummer*

 CLAY A PLUMMER
 Special Assistant United States Attorneys

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE MISAEL DIAZ-MARTINEZ,
aka "Jose Diaz,"
aka "Jose Martinez,"
aka "Jose Alberto Moran-Martinez,"

Defendant.

Case No. 2:25-mj-00373-DJA

**Order Directing Probation to
Prepare a Criminal History
Report**

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 21st day of May, 2025.



HONORABLE DANIEL J ALBRECHTS
UNITED STATES MAGISTRATE JUDGE